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FISHKIN, GURSHUMOV & NUSSBAUM, P.C.

Via ECF and Facsimile to (718) 613-2226

August 21, 2020

Hon. Ann Donnelly, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East, N 415
Brooklyn, New York 11201

Re: *Natalia Pozniak v. Vladimir Shvartsman*
Civ. Act. No.: 20-cv-02956 (AMD-RML)

Dear Honorable Judge Donnelly:

As the Court is aware, I represent respondent Vladimir Shvartsman in the above referenced matter and I write in response to the Court's Scheduling Order of August 21, 2020 which directed the undersigned to submit a letter explaining why respondent could not comply with the deadline for the filing of respondent's opposition to petitioner's Petition for Return of Child under the Hague Convention. For the reasons set forth below, respondent respectfully requests a final brief extension of time, up to and including August 28, 2020 to file opposition papers. A redacted version of this letter will be filed on the Court's docket via ECF and an unredacted version will be provided to Chambers via facsimile. Should the Court require, an unredacted version will also be provided to counsel for defendants.

The Court may recall that a previous extension of time to file the opposition papers was granted on July 29, 2020, for which the undersigned counsel is deeply appreciative. The Court and counsel for petitioner are not aware, however, that [REDACTED]

[REDACTED] I had truly hoped to file the opposition papers within the timeframe set forth in the Court's Order of July 29, 2020, however, [REDACTED]

Additionally, and inasmuch as [REDACTED] and for the good cause shown as set forth above, the undersigned respectfully requests an additional seven (7) days to complete the draft of the opposition papers, up to and including August 28, 2020. The undersigned does not intend to seek any further extensions of time and prays that the Court grant the instant application.

Again, I thank the Court profusely for its anticipated empathy for [REDACTED] and I request the extra time so that the Court can fully resolve this matter on the merits.

I thank the Court for its courtesy and consideration in this matter.

Respectfully submitted,

/s Marcus Aurelius Nussbaum
Marcus A. Nussbaum (MN 9581)

cc: **Via ECF**
All Counsel of Record